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January 18, 2023

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. LaShann DeArcy Hall, U.S.D.J.
225 Cadman Plaza East
Courtroom 4H North
Brooklyn, NY 11201-1804

Re: J.D Workforce, Inc. v. Gafoor, *et ano.*
Case No.: 1:22-cv-7930 (LDH) (MMH)
MLLG File No.: 173-2022

Dear Judge Hall:

This office represents the Plaintiff J.D Workforce, Inc. (“Plaintiff”) in the above-referenced case. Plaintiff writes¹ to respectfully apprise the Court of the parties’ efforts to resolve the instant motion for injunctive relief without further motion practice.

Although the parties have met-and-conferred telephonically twice over the past week after meeting and conferring in-person following the court conference, and despite the fact the parties appeared to have reached a resolution that *would* resolve the pending motion *in toto*, regrettably, these negotiations have failed.

A draft proposed stipulated Order and preliminary injunction was sent to Defendants on January 12, 2023. Following a telephonic meet-and-confer with Defendants’ counsel and a conference between your undersigned and the principals of Plaintiff, a revised proposed stipulated Order and preliminary injunction was sent to Defendants today at 10:33 AM. At 4:33 PM today, Defendants sent back comments to the January 12, 2023 proposed stipulated Order (rather than the revised January 18, 2023 document sent earlier today) which appeared to argue the merits of the case rather than provide any constructive feedback on the terms set forth in the proposed Order.

Plaintiff immediately responded to Defendants at 4:39 PM concerning these issues, but did not hear back from Defendants’ counsel until 8:11 PM (who left a voice message), when your undersigned was unavailable to speak. Later efforts to reach Defendants’ counsel were unsuccessful, as all calls went directly to Defendants’ counsel’s voicemail.

The parties will therefore keep to the current motion schedule in place, with opposition papers due on February 1, 2023 and reply papers in further support due on February 7, 2023.

¹ Regrettably, although efforts were made to submit the instant correspondence as a joint letter, Defendants did not state whether they consent to submit the instant letter jointly.

Plaintiff respectfully notes, further that Defendants have not yet entered their appearance, and Defendants' response to the complaint is currently due on January 24, 2023 according to the docket.

Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Lake Success, New York
January 18, 2023

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

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